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November 14, 2019

By ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, Case No. 18-cr-224 (AJN)

Dear Judge Nathan:

On behalf of Defendant Ali Sadr, we respectfully submit this letter regarding Sadr's Motion to Strike Surplusage (Pretrial Motion No. 7).

After conferring, Sadr and the government agree that in the event the jury receives a copy of the indictment, the parties will remove paragraphs one through five from the indictment the jury receives. In addition, Sadr withdraws his request to strike "among others," without prejudice to renewing that request at a later time.

Sadr and the government were unable to resolve Sadr's requests (1) to strike the citations in Count Two to 50 U.S.C. §§ 1701-1707, all regulations in 31 C.F.R. pt. 560, all regulations in 31 C.F.R. pt. 561, and 31 C.F.R. § 560.205; and (2) to strike the reference to "the government of Iran" from paragraphs 19 and 23.

Thank you for your consideration.

Respectfully submitted,

/s/ Brian M. Heberlig

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cc: Counsel of Record (via ECF)